

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TRONOX, INC. SECURITIES LITIGATION)	Civil Action No. 09-CV-06220-SAS
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)	Electronically Filed
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THIS DOCUMENT RELATES TO ALL CLASS ACTIONS)	
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**CLASS COUNSEL’S NOTICE OF MOTION FOR AN AWARD OF
ATTORNEYS’ FEES, REIMBURSEMENT OF LITIGATION
EXPENSES AND CLASS REPRESENTATIVES’ REQUEST FOR
REIMBURSEMENT OF COSTS AND EXPENSES**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the declarations submitted therewith, the Stipulation and Agreement of Settlement executed by Plaintiffs and Defendants dated August 3, 2012 (ECF No. 186), Lead Plaintiffs’ Motion for Final Approval of Settlement and Plan of Allocation, and all other documents, pleadings and matters of record herein, Class Counsel will respectfully move this Court, before the Honorable Shira A. Scheindlin, United States District Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York, on November 19, 2012 at 4:30 p.m. for an Order finding that Class Counsel’s requested fees and expenses are fair, reasonable and adequate and thus should be awarded, and that the Class Representatives’ request for reimbursement of costs and expenses should be granted.

Dated: October 15, 2012

Respectfully submitted,

GOLD BENNETT CERA & SIDENER LLP

By: /s/ Solomon B. Cera
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Attorneys for Named Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered users.

/s/Solomon B. Cera

Solomon B. Cera